

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

K.C. HOPPS, LTD.,

Plaintiff,

v.

THE CINCINNATI INSURANCE COMPANY, INC.,

Defendant.

Case No. 4:20-cv-00437-SRB

EXHIBIT 2

DEFENDANT'S REDLINE OF PLAINTIFF'S PROPOSED JUROR QUESTIONNAIRE

(As Attached to Email Sent from Defendant's Attorney D. Litchfield on 10/1/2021)

NAME: _____

JUROR QUESTIONNAIRE

Thank you for coming to court as a potential juror. The questions on this form are designed to help the court and the lawyers learn something about you. The questions are not asked to invade your privacy, but to make sure that you can be a fair and impartial juror.

You should answer the questions carefully and completely. Please do not leave any questions blank. If a question does not apply to you, simply write N/A (for Not Applicable) in the space for the answer. If no response to a question is written by you, we will assume that you mistakenly skipped it and may ask you about it in court.

Please DO NOT write on the back of any page. If you need more room, continue at the bottom or side of the page or on a blank page.

You may be asked follow-up questions later to clarify your answers. If there are questions that you would feel more comfortable answering in private, simply write "private" in the space provided for your answer and circle the question number. Any follow-up questions on that topic will be held out of the presence of the other jurors.

If you have trouble reading, understanding, or filling out this form, please let the court clerk know.

PLEASE REMEMBER THAT YOU ARE ANSWERING THESE QUESTIONS UNDER PENALTY OF PERJURY. YOUR ANSWERS MUST BE TRUE AND COMPLETE.

1. City/Town where you live or nearest to where you live: _____
2. What is your highest level of education? What year did you graduate?

3. What is your occupation (or what was your latest occupation if you are retired unemployed, or disabled)?

4. Have you ever owned your own business? Yes _____ No _____

If "yes" please describe the type of business, the number of employees and the length of time the business is or was owned:

5. Have you visited any of the following establishments:

_____ Blue Moose Bar & Grill (Prairie Village, KS)	_____ Barley's Brewhaus (Shawnee, KS)
_____ Blue Moose Bar & Grill (Lenexa, KS)	_____ Moose Truck Food Truck
_____ Stroud's (Overland Park, KS)	_____ O'Dowd's Gastrobar (Kansas City, MO)
_____ The View at Briarcliff (Kansas City, MO)	_____ Hy-Vee Arena (Kansas City, MO)
_____ Blue Moose Bar & Grill (Kansas City, MO)	

If yes, when was the last time you visited each establishment you identified? _____

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Deleted: background and your views on issues that may be related to this case.

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Also, have you had any catering done for you by Hopps Catering of Overland Park, Kansas? _____. If your answer was yes, when did that happen? _____

6. Have you, a family member or a friend, ever worked for the Cincinnati Insurance Company or any company affiliated with it? Yes ____ No ____

If Yes, please identify the person involved and the nature of their job at the time: _____

7. Have you, a family member or a friend, ever worked for any insurance company? Yes ____ No ____

If Yes, please identify the person involved and the nature of their job at the time: _____

8. Have you ever sued someone or been sued by someone? Yes ____ No ____

If yes, please describe the type of case, court where the suit was filed and outcome of the case: _____

9. Are you presently being treated for a medical condition that could affect your ability to sit as a juror in this case? Yes ____ No ____

If yes, please describe the condition and how you believe it would affect your ability to serve: _____

10. Have you a family member or a friend ever made an insurance claim?

Yes ____ No ____ If yes, please explain the circumstances of the claim and its outcome: _____

21. Have you, a family member or a friend ever worked in a restaurant? Yes ____ No ____ If your answer is yes, please identify the restaurant and the position or positions you held there. _____

22. Have you, a family member or a friend ever worked for KC Hopps or any of its affiliated bars or restaurants? Yes ____ No ____ If your answer is yes, please identify the bar or restaurant, years of employment and positions held _____

I declare under penalty of perjury, that the following answers are true and correct to the best of my knowledge.

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Deleted: <#> Have you or a loved one tested positive for the SARS-CoV-2 (COVID-19) virus? Yes ____ No ____

Have you been vaccinated against the SARS-CoV-2 (COVID-19) virus? Yes ____ No ____

If no, why have you not been vaccinated: _____

Do you believe people should wear masks while indoors to protect against the transmission of SARS-CoV-2 (COVID-19)? Yes ____ No ____

Please explain: _____

How much do you disagree or agree with the following opinions? Circle a number between 1 and 4.

	Strongly Agree	Agree	Disagree	Strongly Disagree
There are too many lawsuits in our society.	1	2	3	4
Lawsuits are costing us all too much.	1	2	3	4
People in our society today are too ready to sue.	1	2	3	4
Corporations can never be trusted.	1	2	3	4
Jury awards are too high.	1	2	3	4

Executed in the County of Jackson, Missouri on October ___, 2021.

SIGNATURE